

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

THE STATE OF TEXAS, et al.,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Civil Action No. 4:20-cv-00957-SDJ

JOINT STIPULATION

The Parties, the Plaintiff States and Defendant Google LLC (“Google”), jointly submit this Stipulation with a proposed order memorializing this stipulation.

WHEREAS, Google has issued deposition notices under Federal Rule of Civil Procedure 30(b)(6) to each of the Plaintiff States;

WHEREAS, before the Plaintiff States can identify specific witnesses to testify on their behalf, the Plaintiff States require that Google enter a stipulation that it will not seek or move to disqualify in this case any Office of Attorney General attorneys who may (1) be designated as a Rule 30(b)(6) witness for his or her respective State; and (2) who sit for such deposition either on the basis of the attorney witness rule or any other rule of law; and

WHEREAS, Google has agreed to enter into such a stipulation.

IT IS HEREBY STIPULATED AND AGREED, between the undersigned parties, through their undersigned counsel:

The parties stipulate and agree that Google will not seek or move to disqualify in this case any Office of Attorney General (“OAG”) attorneys for any Plaintiff State on the basis that the OAG attorneys may be or have been designated as a witness or otherwise sit for as a Rule 30(b)(6)

witness for their respective Plaintiff State.

The Parties respectfully request that the Court enter the attached proposed order memorializing this stipulation.

Dated: April 18, 2024

Respectfully submitted,

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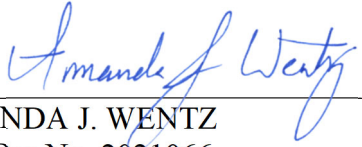
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CERTIFICATE OF SERVICE

I certify that on April 18, 2024, this document was filed electronically in compliance with Local Rule CV-5(a) and served on all counsel who have consented to electronic service, per Local Rule CV-5(a)(3)(A).

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